

EXHIBIT C

Kurtenbach, Collin

From: Julio Gomez <JGomez@smcomplex.com>
Sent: Thursday, August 17, 2023 5:19 PM
To: Yothers, Stuart W.; David Stone
Cc: Ryan, Colleen Noonan; Holmes, Jacqueline M.; Kurtenbach, Collin; Robert Magnanini; Robert Goodman; Stephen Schweizer; Tara Saybe; Vanessa Espinal; Jiji Kabsi
Subject: Hayden v. IBM - deposition scheduling

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Stuart,

In addition to a Fed. R. Civ. P. 30(b)(6) deposition, Plaintiff's current list of potential deponents includes:

1. Shanker Ramamurthy
2. Pablo Suarez
3. Anthony Lipp
4. William Fuessler
5. Tom Eck
6. Mark Foster
7. Peter Korsten
8. Jesus Mantas
9. Chae An or Bridget Van Kralingen

Please advise if your firm represents and will accept service of subpoenas for the non-parties listed.

Plaintiff reserves the right to amend this list if individuals are not available.

We will send dates for the depositions defendants are seeking as soon as we can.

Thank you.

Julio C. Gomez

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From: Yothers, Stuart W. <syothers@jonesday.com>

Sent: Thursday, August 17, 2023 2:19 PM

To: David Stone <DStone@smcomplex.com>

Cc: Julio Gomez <JGomez@smcomplex.com>; Ryan, Colleen Noonan <cnryan@jonesday.com>; Holmes, Jacqueline M. <jholmes@JonesDay.com>; Kurtenbach, Collin <ckurtenbach@jonesday.com>; Robert Magnanini <RMagnanini@smcomplex.com>; Robert Goodman <RGoodman@smcomplex.com>; Stephen Schweizer <sschweizer@smcomplex.com>; Tara Saybe <TSaybe@smcomplex.com>; Vanessa Espinal <VEspinal@smcomplex.com>; Jiji Kabsi <JKabsi@smcomplex.com>

Subject: RE: Hayden v. IBM - deposition scheduling

David,

Some of the individuals plaintiff has noticed travel extensively and have limited availability before October 6. We are working to obtain dates for each of the individuals you noticed and we would like to get a schedule put in place as soon as possible. Jean-Stéphane Payraudeau is available on September 6, 2023, and Shanker Ramamurthy is available on September 7, 2023. We will follow-up with you as soon as we have dates for others, and we would appreciate receiving dates for the individuals you are representing.

Thanks,

Stuart W. Yothers ([bio](#))

Partner

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From: David Stone <DStone@smcomplex.com>

Sent: Tuesday, August 15, 2023 2:56 PM

To: Yothers, Stuart W. <syothers@jonesday.com>

Cc: Julio Gomez <JGomez@smcomplex.com>; Ryan, Colleen Noonan <cnryan@jonesday.com>; Holmes, Jacqueline M. <jholmes@JonesDay.com>; Kurtenbach, Collin <ckurtenbach@jonesday.com>; Robert Magnanini <RMagnanini@smcomplex.com>; Robert Goodman <RGoodman@smcomplex.com>; Stephen Schweizer <sschweizer@smcomplex.com>; Tara Saybe <TSaybe@smcomplex.com>; Vanessa Espinal <VEspinal@smcomplex.com>; Jiji Kabsi <JKabsi@smcomplex.com>

Subject: Re: Hayden v. IBM - deposition scheduling

Stuart we noticed a number of depositions as well that need to be scheduled. We can provide more details tomorrow

Sent from my iPhone

On Aug 15, 2023, at 1:58 PM, Yothers, Stuart W. <syothers@jonesday.com> wrote:

All:

Due to travel schedules and the amount of time remaining in fact discovery, we would like to get the depositions scheduled. Please confirm that you will be ready to begin depositions by September 1. If so, we will work to provide available dates between September 1 and October 6 for the IBM individuals

you have noticed for deposition. Mr. Cummings' counsel has confirmed his deposition for next Thursday, August 24, in Manchester, NH. With respect to Messrs. Bingham, Cohen, Gotlieb and Trinh, please let us know their available dates. Additionally, please let us know what dates Mr. Hayden is available.

Thanks,
Stuart

Stuart W. Yothers ([bio](#))
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